1	Steven J. Parsons Nevada Bar No. 363 LAW OFFICES OF STEVEN J. PARSONS 10091 Park Run Dr Ste 200	
3	Las Vegas, NV 89145-8868 (702) 384-9900	
4	(702) 384-5900 – (fax) Steve@SJPlawyer.com	
5	Attorney for Plaintiff NEVADA TITLE COMPANY	
7	UNITED STATES D	ISTRICT COURT
8	DISTRICT OF	NEVADA
9	NEVADA TITLE COMPANY, a Nevada corporation,	Case No. 2:18-cv-1823-GMN-(VCF)
10	Plaintiff,	THE PARTIES' STIPULATION and (PROPOSED) ORDER TO ENLARGE TIME
11	VS.	FOR PLAINTIFF TO RESPOND TO DEFENDANT'S MOTION TO MODIFY
12	ACE AMERICAN INSURANCE COMPANY, a Pennsylvania corporation,	SCHEDULING ORDER TO PHASE DISCOVERY AND SCHEDULE DISPOSITIVE MOTIONS ON CLAIMS RELATING TO NTC'S
14	Defendant.	PRIOR KNOWLEDGE (Doc. 31) (Second Request)
15	ACE AMERICAN INSURANCE COMPANY, a Pennsylvania corporation,	
16	Counter-Complainant,	
17	VS.	
18 19	NEVADA TITLE COMPANY, a Nevada corporation,	
20	Counter-Defendant.	
21		
22	Plaintiff and Counter-defendant, NEVAD	A TITLE COMPANY, ("NTC") by its counsel,
23	Steven J. Parsons, of Law Offices of Steven J. Parsons, and Defendant and Counter-claimant,	
24	ACE AMERICAN INSURANCE COMPANY, ("AC	CE American") by its counsel, Michael W.
25	Melendez, of COZEN O'CONNOR, hereby stipulate and agree that NTC shall have to and including	
26	Monday April 8 2019 to respond to ACE Americ	an's Motion to Modify Scheduling Order (Doc



27 **31).**

2	2019 to respond to ACE's discovery requests.	
3	This Stipulation between the parties to allow NTC an additional time to respond to the	
4	Motion to Modify Scheduling Order is the second request; Plaintiff asserts it is necessitated	
5	by current health conditions of Plaintiff's counsel Steven J. Parsons; ¹ it is also necessitated	
6	by the tragic and untimely loss of a family member of Plaintiff's co-counsel; and is not simply	
7	for the purposes of delay.	
8	Dated: Friday, March 29, 2019.	
9	LAW OFFICES OF STEVEN J. PARSONS	COZEN O'CONNOR
10	/s/ Steven J. Parsons STEVEN J. PARSONS Nevada Bar No. 363	/s/ Michael W. Melendez MICHAEL W. MELENDEZ Nevada Bar No. 6741
12	Attorney for Plaintiff and Counter-defendant NEVADA TITLE COMPANY	Attorney for Defendant and Counter-claimant ACE AMERICAN INSURANCE COMPANY IT IS HEREBY ORDERED that the motion to modify scheduling order (ECF NO. 31) is
14 15	IT IS SO ORDERED.	DENIED as MOOT.
16	Dated: April 1, 2019	Contract
17	Ū	S. MAGISTRATE JUDGE
18		

The parties also stipulate that NTC shall have up to and including Monday, April 22,

¹Mr. Parsons, as good cause shown, submits that he has endured a series of foot injuries, and as a diabetic, he has a history of such injuries becoming infected and posing further dire risks to his health. These injuries and the treatment of the injuries has caused his absence from timely attending to the Response to Defendant's Motion and Defendant's discovery requests.

On Friday, March 22, 2019, upon presenting with a recurring injury already the subject of care, treatment, and absence from the office, the wound care physician attending to Mr. Parsons immediately sent him to the hospital. Mr. Parsons was discharged late Monday, March 25, 2019. However Friday, March 29, 2019, Mr. Parsons learned from his orthopedist that he must submit to surgery, Thursday, April 4, 2019 to deal with the MRSA-infection and restructuring of the wound. In total, Mr. Parsons has been on medication and doctors' orders to stay off of his feet and not undertake office work since the first recurrence of his injuries over three (3) weeks ago. In that time, Mr. Parsons has been in the office only sporadically for less that two (2) days.



19

21

22

1